

EXHIBIT D

IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION
Confidential Justin Christian on 10/07/2020

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 ALEXANDRIA DIVISION
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IN RE: CAPITAL ONE
CONSUMER DATA SECURITY
BREACH LITIGATION

MDL No. 1:19md2915
(AJT/JFA)

CONFIDENTIAL; SUBJECT
TO PROTECTIVE ORDER

- - -

Videotaped Videoconference Deposition of

JUSTIN CHRISTIAN

(Taken by Plaintiffs)

Tampa, Florida

October 7, 2020

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Reported by: Lynne C. Fulwood

Certified Court Reporter

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1 Q Okay. I'm going to go up to row 662,
2 July 29th, 17:04:18. You write: I should have
3 realized this earlier, but their normally AWS folks
4 probably aren't in on this.

5 You see that?

6 A Yes.

7 Q Can you explain what you're referencing
8 here? Why weren't Capital One's normal AWS folks
9 involved?

10 MR. NEWBY: Objection to form.

11 A I don't recall what led me to make this
12 supposition.

13 BY MR. BARTHLE:

14 Q Were you also involved in some
15 investigations regarding whether other companies were
16 compromised by Paige Thompson -- other AWS customers
17 were compromised by Paige Thompson?

18 A Yes, although to what extent I can't
19 recall.

20 Q Did you come to any conclusions about
21 whether other customers had been compromised by her?

22 MR. NEWBY: Objection.

23 A I don't -- I don't recall coming to any
24 such conclusions.

25 BY MR. BARTHLE:

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1 Q Were you just unable to reach a
2 conclusion or you just don't remember what they were?

3 A I do not recall if a conclusion was
4 actually reached.

5 Q Do you recall which customers you
6 investigated on that issue?

7 A I do not specifically recall which
8 customers I investigated.

9 Q Do you remember any of them?

10 A Can you please clarify?

11 Q Do you remember any of the other
12 customers that you investigated concerning whether
13 Paige Thompson had compromised them as well?

14 A I don't recall if I was involved in the
15 investigation in any of the other customers.

16 Q Outside of your direct involvement, do
17 you -- do you recall who any of those other customers
18 were?

19 A I don't recall off the top of my head.

20 Q I want to direct your attention to 647,
21 this is on July 29th, time stamp is 19:50:58. You
22 write: There's still no actual evidence that the
23 actor has any data from these companies. If we were
24 to notify them it would get real awkward if we spun
25 them up with no evidence. Agreed?